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Hearing Date: T.B.D.

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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:  
In re: :

Chapter 11  
Case No. 05-44481 [RDD]

DPH HOLDINGS CORP, *et al.*, :

Reorganized Debtors. :

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:  
**JOINDER IN REORGANIZED DEBTORS' OMNIBUS  
RESPONSE TO MOTIONS FOR RELIEF FROM FOURTH  
ORDER EXTENDING THE TIME TO SERVE COMPLAINT**

TO THE HONORABLE ROBERT D. DRAIN,  
UNITED STATES BANKRUPTCY JUDGE:

DPH Holdings Corporation and certain of its affiliated reorganized debtors, as plaintiffs in six adversary proceedings (the "Plaintiffs"),<sup>1</sup> by their conflicts counsel Togut, Segal & Segal (the "Togut Firm"), join in the Omnibus Response to Motions for Relief from Fourth Order Extending the Time to Serve Complaint (the "Omnibus Response") filed on the Plaintiffs' behalf in parallel adversary proceedings by the Butzel Long firm.

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<sup>1</sup> *DPH Holdings Corp., et al. v. Ex Cell O Machine Tools Inc.* (Adv. Pro. No. 07-02337) (the "Ex Cello O Action"); *DPH Holdings Corp., et al. v. NGK, et al.* (Adv. Pro. No. 07-02541) (the "NGK Action"); *DPH Holdings Corp., et al. v. Johnson Controls, et al.* (Adv. Pro. No. 07-02348); *DPH Holdings Corp., et al. v. Kostal, et al.* (Adv. Pro. No. 07-02712); *DPH Holdings Corp., et al. v. NSK Steering Systems* (Adv. Pro. No. 07-02459); and *DPH Holdings Corp., et al. v. Sumitomo, et al.* (Adv Pro No. 07-02659).

The Omnibus Response addresses, *inter alia*, the arguments raised in ATS Automation Tooling Systems Inc.'s Motion and Brief of Defendant for Relief from Fourth Order Extending Time to Serve Complaint (the "ATS Motion"). The defendants in the Ex Cell O Action and the NGK Action, in which the Togut Firm represents the Plaintiffs, joined in the ATS Motion. Because the Omnibus Response responds to the arguments raised in the ATS Motion, we join in the Omnibus Response.

Dated: New York, New York  
February 3, 2011

Respectfully submitted,

DPH Holdings Corp., *et al.*  
By their conflicts counsel,  
TOGUT, SEGAL & SEGAL LLP  
By:

/s/ Neil Berger  
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